

Research Activities Tax Credit

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Outline of Remarks

- Background on the Iowa Research Activities Tax Credit (RAC)
- Other R&D tax credits in the United States
- R&D expenditures, claims, and refunds
- Evaluation of Research Activities Tax Credit Programs



Background on the Iowa Research Activities Tax Credit (RAC)

- Tax credit for increases in qualifying expenditures associated with research conducted in Iowa
 - Available since tax year 1985
 - Applicable to corporate income tax, individual income tax, and fiduciary tax
 - Based on rules governing the federal Research and Experimentation Tax Credit
 - Refundable
- Limited to certain industries: manufacturing, life sciences, software engineering, aviation/aerospace, and agriscience industries.



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RAC Calculation Methods

- Regular Method (Form IA 128)
 - 6.5 percent of incremental basic research in Iowa, and
 - 6.5 percent of incremental qualified research expenditures apportioned to lowa over larger of the base period amount or 50 percent of current year research expenditures
- Alternative Simplified Method (Form IA 128S)
 - Available since 2010
 - 6.5 percent of incremental basic research in Iowa, and
 - 4.55 percent of qualified research expenditures above 50 percent of average qualified research expenditures in Iowa over the prior three years; or,
 - 1.95 percent of total qualified research expenditures in lowa in the current year when no prior research has been conducted



Supplemental Research Activities Tax Credit (SRAC)

- May be awarded by the Iowa Economic Development Authority (EDA) to companies participating in the High Quality Jobs Program
- Initially SRAC allowed taxpayer to double the RAC for up to five years
- Since 2011 the tax credit rate varies by recipient's gross revenues and can be claimed over five years up to the total amount of the award



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SRAC Calculation Methods

- Gross revenues of \$20 million or more:
 - Regular method: 3 percent of incremental QREs
 - Alternative method: 2.1 or 0.9 percent of QREs
- · Gross revenues of \$20 million or less:
 - Regular method: 10 percent of incremental QREs
 - Alternative: 7 or 3 percent of QREs



Other R&D Tax Credits in the United States

- Federal Research and Experimentation Tax Credit
 - Enacted in 1981, extended 16 times, made permanent by PATH Act in 2015
 - Nonrefundable
 - Methods: Regular (20 percent), Alternative (14 percent)
- 35 states offer R&D tax credit
 - Midwest states were among the first states to adopt RAC
 - Spread: 11 states (1991); 32 states (2001)
 - Nine Midwest states (75 percent of the region) have RAC programs



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Other R&D Tax Credits in the United States

- Credit Rates
 - Rates vary from 3 to 33 percent
 - Many states have tiered system
 - Midwestern states tend to offer higher rates
- Caps and other Limitations
 - 16 states limit amount of tax credit
 - Dollar amount (e.g. Maryland, New Hampshire, Arkansas)
 - Percentage of liability (e.g. Virginia, Florida, South Carolina)
 - 7 states impose statewide caps
 - New Hampshire = \$7 million
 - New York = \$250 million
- Broadly Refundable: DE, IA, HI, NE, LA, MA, NY, VA



R&D Tax Credits in Iowa and Neighboring States

- IA, IL, MN, NE, and WI offer R&D tax credits
 - Iowa and Illinois tie for highest overall rate (6.5 percent)
 - Fully refundable in IA and NE; partially refundable in WI
 - MN was refundable 2010-2012 only
- MO and SD do not offer R&D tax credits
 - IL expired previously but was renewed to 2027
 - MO tax credit expired in 2005



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Historical Business Research Expenditures in Iowa

| | Total R&D | Total R&D | Percent Change | R&D Per | R&D Per Capita | Percent Change |
|------|---------------|--------------|----------------|-------------|----------------|----------------|
| Year | (\$ Millions) | (State Rank) | since 1997 | Capita (\$) | (State Rank) | Since 1997 |
| 2010 | \$2,123 | 26 | 161.01% | \$696 | 20 | 144.20% |
| 2011 | \$2,468 | 25 | 203.42% | \$805 | 19 | 182.41% |
| 2012 | \$1,846 | 28 | 126.93% | \$600 | 28 | 110.52% |
| 2013 | \$2,111 | 26 | 159.58% | \$682 | 24 | 139.49% |
| 2014 | \$2,119 | 26 | 160.53% | \$681 | 24 | 139.07% |
| 2015 | \$2,539 | 26 | 212.17% | \$813 | 18 | 185.36% |
| 2016 | \$2,834 | 25 | 248.39% | \$904 | 19 | 217.39% |
| 2017 | \$2,855 | 24 | 250.98% | \$908 | 17 | 218.68% |
| 2018 | \$3,146 | 24 | 286.78% | \$999 | 14 | 250.49% |

Source: National Center for Science and Engineering Statistics



Research Expenditures

| Tax Year | Firms | Total IA Expenditures (\$ Millions) |
|----------|-------|-------------------------------------|
| 2010 | 414 | \$1,368.13 |
| 2011 | 466 | \$1,508.01 |
| 2012 | 521 | \$1,728.94 |
| 2013 | 569 | \$2,250.92 |
| 2014 | 614 | \$2,123.63 |
| 2015 | 659 | \$2,368.88 |
| 2016 | 700 | \$2,453.78 |
| 2017 | 598 | \$2,351.01 |
| 2018 | 517 | \$2,287.71 |

Source: Iowa Department of Revenue Credit Award, Claim, and Transfer Administration System (CACTAS),

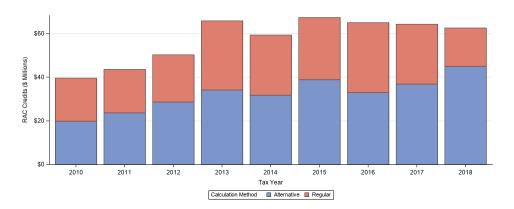
Form IA 128 and 128S

Note: Data for tax year 2018 is incomplete



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Credits by Tax Year and RAC Calculation Method



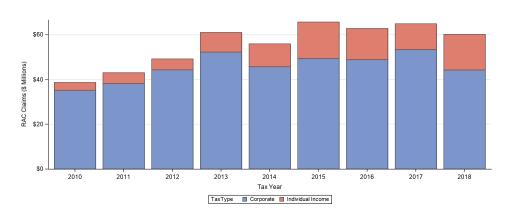
Source: Iowa Department of Revenue Credit Award, Claim, and Transfer Administration System (CACTAS),

Form IA 128 and 128S Note: Data for tax year 2018



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RAC Claims by Tax Type



Source: Iowa Department of Revenue Credit Award, Claim, and Transfer Administration System (CACTAS),

Form IA 148

Note: Data for tax year 2018 is incomplete



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RAC Claims by Fiscal Year

| | RAC | | S | SRAC | | Total | |
|-------------|--------|---------------|--------|---------------|--------|---------------|--|
| Fiscal Year | Number | Millions (\$) | Number | Millions (\$) | Number | Millions (\$) | |
| 2010 | 1,030 | \$14.23 | 174 | \$3.80 | 1,204 | \$18.03 | |
| 2011 | 993 | \$41.55 | 157 | \$20.24 | 1,150 | \$61.79 | |
| 2012 | 2,054 | \$38.44 | 200 | \$14.59 | 2,254 | \$53.04 | |
| 2013 | 1,505 | \$29.33 | 151 | \$12.36 | 1,656 | \$41.69 | |
| 2014 | 1,598 | \$48.16 | 159 | \$16.18 | 1,757 | \$64.34 | |
| 2015 | 1,885 | \$39.60 | 170 | \$6.66 | 2,055 | \$46.25 | |
| 2016 | 2,401 | \$48.67 | 98 | \$5.13 | 2,499 | \$53.80 | |
| 2017 | 5,612 | \$67.18 | 120 | \$7.50 | 5,732 | \$74.68 | |
| 2018 | 5,428 | \$69.29 | 110 | \$3.36 | 5,538 | \$72.64 | |
| 2019 | 8,040 | \$82.16 | 56 | \$2.58 | 8,096 | \$84.74 | |
| 2020 | 7,787 | \$79.60 | 52 | \$2.34 | 7,839 | \$81.94 | |

Source: Iowa Department of Revenue Credit Award, Claim, and Transfer Administration System

(CACTAS), Form IA 148

Note: Verified claims only; Tax credit claim numbers are preliminary



RAC and SRAC Claims Paid as Refunds

| | Corporation Income Tax | | | Individual Income Tax | | |
|----------|------------------------|---------|---------|-----------------------|---------|---------|
| Tax Year | Claims | Refunds | Percent | Claims | Refunds | Percent |
| 2010 | \$35.15 | \$25.73 | 73.2% | \$3.81 | \$3.79 | 99.4% |
| 2011 | \$38.22 | \$26.20 | 68.6% | \$5.21 | \$5.16 | 99.2% |
| 2012 | \$44.29 | \$29.47 | 66.5% | \$5.10 | \$4.88 | 95.6% |
| 2013 | \$52.19 | \$43.02 | 82.4% | \$9.24 | \$3.56 | 38.5% |
| 2014 | \$45.70 | \$38.68 | 84.6% | \$10.87 | \$4.41 | 40.6% |
| 2015 | \$48.77 | \$40.75 | 83.6% | \$16.82 | \$10.19 | 60.6% |
| 2016 | \$48.85 | \$42.86 | 87.7% | \$14.35 | \$4.97 | 34.6% |
| 2017 | \$54.10 | \$46.37 | 85.7% | \$12.03 | \$4.87 | 40.5% |
| 2018 | \$42.42 | \$28.26 | 66.6% | \$16.80 | \$6.94 | 41.3% |

Source: Iowa Department of Revenue Credit Award, Claim, and Transfer Administration System (CACTAS),

Note: Data for tax year 2018 is incomplete



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Research Questions

- Research Question 1: Do incremental research activity tax credit programs stimulate research inputs and outputs?
- Research Question 2: What specific program features (if any) are effective at stimulating research inputs and outputs?



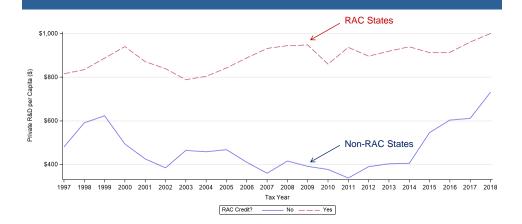
Research Design

- Unit of analysis: State-Years, 1969-2019
- Dependent Variables:
 - Research Inputs: Private Research Expenditures per Capita (\$)
 - Research Outputs: Utility Patents per 1,000 Residents
- Independent Variables
 - Does the state have a RAC Program?
 - Highest Percentage Rate of Credit
 - Does the state have a refundable credit?
- · Methodology:
 - Test the difference of means in research inputs and outputs across RAC and Non-RAC states
 - Estimate effect of RAC using multiple regression analysis which controls for other factors
 - Predict economic outcomes under different scenarios to assess RAC impact



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RAC Program: Private R&D

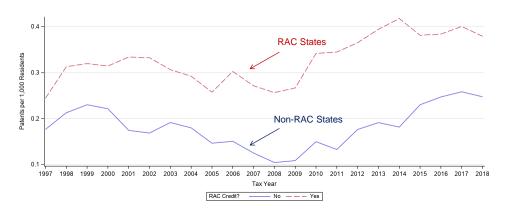


Source: National Center for Science and Engineering Statistics

T-Value = 9.61, Probability = less than 0.01 percent



RAC Program: Utility Patents



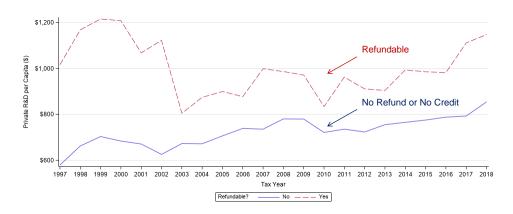
Source: U.S. Patent and Trademark Office

T-Value = 21.4, Probability = less than 0.01 percent



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Refundable RAC: Private R&D

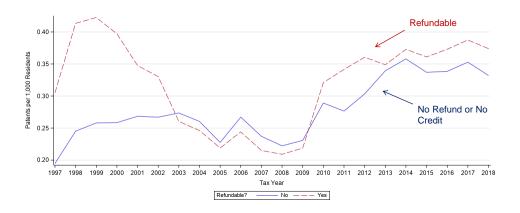


Source: National Center for Science and Engineering Statistics

T-Value = 4.70, Probability = less than 0.01 percent



Refundable RAC: Utility Patents



Source: U.S. Patent and Trademark Office

T-Value = 8.38, Probability = less than 0.01 percent



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Multiple Regression: RAC Program

| Variable | Model 1: R&D | Model 2: Patents |
|---------------------------------|--------------|------------------|
| RAC State (0 = "No", 1 = "Yes") | -1.749*** | 0.008 |
| | 0.229 | 0.007 |
| Observations | 1,100 | 2,050 |
| R^2 | 0.917 | 0.748 |

Note: *p<0.10 **p<0.05 ***p<0.01

- Existence of RAC program is associated with less R&D-> statistically significant
- Existence of RAC program is associated with more patents > not statistically significant



Multiple Regression: Program Features

| Variable | Model 1: R&D | Model 2: Patents |
|---|--------------|------------------|
| Highest Rate of RAC Credit | -0.093*** | 0.001** |
| | 0.028 | 0.001 |
| Partially or Fully Refundable (0 = "No", 1 = "Yes") | -0.384 | -0.060*** |
| | 0.487 | 0.014 |
| Observations | 1,100 | 2,600 |
| R^2 | 0.914 | 0.722 |

Note: *p<0.10 **p<0.05 ***p<0.01

- RAC rate is associated with *less R&D* (significant) but *more patents* (significant)
- Refundability is associated with less R&D (not significant) and fewer patents (significant)



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Predicted Economic Outcomes

- What if Iowa did not have a RAC program in 2015?
 - Without the RAC, the model predicted lows to have \$175 more private R&D per capita—an increase of 28.6 percent
 - Without the RAC, the model predicted lowa to have 0.01 fewer utility patents per 1,000 residents—a decrease of 2.6 percent
- What if Iowa did not have a refundable RAC in 2015?
 - Without a refundable RAC, the model predicted lowa to have \$41.30 more private R&D per capita—an increase of 6.8 percent.
 - Without a refundable RAC, the model predicted lowa to have 0.01 more utility patents per 1,000 residents—an increase of 2.9 percent
- What if Iowa had 10 percent credit rate in 2015?
 - Increasing the credit rate, the model predicted lowa to have \$90.04 fewer private R&D per capita—an decrease of 15.6 percent
 - Increasing the credit rate, the model predicted lowa to have 0.01 more utility patents per 1,000 residents—an increase of 2.4 percent



Conclusion

- Iowa's RAC is competitive compared to other states
- RAC Claims in Iowa:
 - For TY 2018, credit earners reported approx. \$2.3 billion in research expenditures
 - Based on past five years
 - · 75% of claims are against corporation income tax
 - 82% of corporation income tax claims are refunded
 - 80% of RAC refunds are paid to corporation taxpayers
 - Fiscal impact of \$81.9 million for FY 2020



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Conclusion

- Limited evidence that RAC programs increase research inputs and outputs
 - RAC programs associated with fewer R&D but marginally more patents
 - Neither refundability nor credit rate appear to positively impact inputs and outputs
- Limitations:
 - R&D data is imperfect;
 - Binary data complications
 - All private industries rather than R&D heavy firms
 - Causal direction is unclear





Thank You!